

**ASSOCIATED CALIFORNIA LOGGERS**

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May 22, 2007

Dr. Robert F. Sawyer, Chair  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

SUBJECT: Proposed Diesel Off-Road Regulation

Dear Dr. Sawyer:

The Associated California Loggers, an association of contract loggers, log truckers, and log road builders, respectfully opposes the Proposed Diesel Off-Road regulations to be taken up at the meeting of the Air Resources Board on May 25.

We understand that the regulations up for vote on May 25 are specific to construction vehicles and equipment. Though off-road diesel regulations for the agriculture industry, including forestry and logging, are not under consideration at this time, a number of our logging company members and log road builder members also work in construction and hence are affected by the construction regulations that you are voting on this year.

Moreover, we believe that if the construction regulations are not properly conceived and given a feasible timeline for business compliance, this will adversely affect the content and timing of the agriculture/logging regulations yet to come.

Our industry is committed to the achievement of proper air quality in California, and our individual companies have strived to comply with air quality requirements as they exist now. Some of our members have participated in the much-needed Carl Moyer program which provides funds for retrofits of diesel vehicles.

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Nonetheless, the new regulations under consideration by CARB are, at this time, unworkable in terms of compliance, unrealistic as to compliance deadlines, and unaffordable in terms of equipment requirements.

Many of our logging companies are small businesses that are extremely limited in their income and ability to spend money on the retrofit, re-powering, or replacement of new equipment. These companies will be struggling to comply with the dictates proposed by these regulations under any circumstances. But to impose high costs too soon on our industry, and without clear assurances that these costs and purchases of new equipment will meet CARB requirements for years to come, will be disastrous.

Faced with uncertainty and escalating costs, a number of our member companies will be forced to close their doors, or to leave the logging industry for other pursuits. California is already experiencing a decline in the "logging infrastructure" necessary to manage our forest lands and assist in the prevention of massive fires.

It is our understanding that you are preparing to vote on this regulation when equipment is not yet readily available on the market to meet its requirements. In addition, with NOx reduction requirements added to pre-existing PM reduction requirements, equipment is currently not available that can handle the reduction of both pollutants at the same time.

Moreover, under the annual emission reduction targets required under this proposal, many companies will be required to first re-power or retrofit an engine, only to have to turn around a few years later and replace the entire piece of equipment when the technology to do the job right finally hits the marketplace.

A timeline for compliance of 18 years has been reduced to 13 years because of delays in moving these regulations into the marketplace. Our members will be scrambling to meet these unfairly expedited deadlines.

It is clear that government and manufacturers must move forward on the development of technology to clear California air of PM and NOx. Our industry supports such efforts, and is prepared to comply with the final product. But it is clear that at this time, the technology is not fully available to meet the dictates of diesel regulations, there are high costs involved, and there is a high level of uncertainty as to how compliance can be attained by our businesses.

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The Associated California Loggers urges the members of the California Air Resources Board to vote "NO" on the proposed off-highway diesel regulation, and to return to a measured effort to develop cost-effective technology that can be afforded by businesses, with a realistic series of deadlines for compliance.

Sincerely,

Eric Carleson  
Executive Director  
Associated California Loggers